

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

---

MASSACHUSETTS PREMIER SOCCER, )  
LLC, d/b/a “Global Premier Soccer,” )

Plaintiff )

v. )

Civil Action No. 1:20-cv-10430-JCB

SAN DIEGUITO SURF SOCCER CLUB, )  
INC., d/b/a “New England Surf Soccer )  
Club,” “South Carolina Soccer Club,” )  
and “San Diego Surf Soccer Club,” )  
LUKE KRAWCZYK, and )  
ANDREW PROSSER, )

Defendants, )

---

**MEMORANDUM IN SUPPORT OF PLAINTIFF’S MOTION  
TO SUBSTITUTE CORPORATE DEFENDANT WITHOUT PREJUDICE**

Plaintiff Massachusetts Premier Soccer LLC, d/b/a “Global Premier Soccer” (“GPD”) submits this memorandum in support of its motion to substitute Surf Cup Sports, LLC for San Dieguito Surf Soccer Club, Inc. (“SD Surf Club”). In its opposition to pending motions, SD Surf Club has represented to the Court that Surf Cup Sports, LLC is the proper party in this case. In this case arising under the Lanham Act (also involving non-competition and non-solicitation clauses), GPS named the entity that had applied for trademark protection for names like those that are at issue in this case.

Respectfully submitted,

/s/Phillip Rakhunov

Barry S. Pollack (BBO#642064)  
Phillip Rakhunov (BBO#663746)  
POLLACK SOLOMON DUFFY LLP  
101 Huntington Avenue, Suite 530  
Boston, MA 02119  
617-439-9800 (Tel)  
617-960-0490 (Fax)  
bpollack@psdfirm.com  
prakhunov@psdfirm.com

Dated: March 10, 2020

**Certificate of Service**

The undersigned certifies that this document, filed through the ECF system, will be electronically served on counsel who are registered users of ECF on March 10, 2020.

/s/ Phillip Rakhunov